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March 27, 2023

Via Electronic Filing and Federal Express

Hon. Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Windward Bora LLC v. Stuyvesant Construction Corp.*
Docket No.: 19-cv-7275(DLI)(CLP)

Your Honor:

Pursuant to the March 23, 2023 conference before Your Honor, I am annexing hereto a proposed CLE to comply with the Court's directive. During the conference, Your Honor indicated a single CLE, if it covered both summary judgment and general Federal practice, could be sufficient.

The proposed CLE, in person, on April 28, 2023, titled "Pretrial Practice 2023" is a full day CLE in New York from the Practicing Law Institute ("PLI"), covering both general Federal practice as well as summary judgment under FRCP 56 specifically. A PDF of the course is annexed hereto.

Given the all-day nature of the CLE and that it covers both general Federal practice as well as summary judgment specifically, I ask that the Court approve this CLE and that completion of this CLE will be full compliance with the Court's March 23, 2023 conference Order as to all of the directed CLE requirements.

Thank you for your kind consideration and attention to this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'D. Richland', with a stylized flourish at the end.

Daniel H. Richland, Esq.


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Pretrial Practice 2023

1 Location Available

Showing Details for **New York**


[Overview](#)
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Up to 7.5 credits

1-Day Program

See Credit Details Below

Overview

Mark Your Calendar. More Information to Come!

Why You Should Attend

Pretrial practice in federal civil litigation continues to change. As fewer civil cases are tried, the staples of pretrial practice — pleadings, motions to dismiss, discovery, *Daubert* motions, summary judgment, and settlement — have replaced trials as the focus of litigation. What does the changing nature of pretrial practice in litigation mean for your practice? Join our faculty of experienced plaintiffs' and defense attorneys, inside counsel, judges and others as they review what you need to know to succeed at this increasingly important stage of litigation.

What You Will Learn

After completing this session, participants will be able to:

- Plan the litigation
- Investigate the facts and the law
- Plead their case
- Conduct pretrial motions
- Master settlement strategies

Who Should Attend

This program will help attorneys who are not yet experienced litigators become familiar with the ins and outs of pretrial practice.

Special Feature: Earn 6 transitional Skills credits

Program Level: Update

Prerequisites: An interest in pretrial practice.

Advanced Prep: None

Topics

[Litigation](#) · [Practice skills \(Litigation\)](#) · [Pre-trial procedure](#)

Industries

[Legal Services](#)

Register

\$1,940.00

Watch Online

☐ Watch Online

Apr 28, 2023

9:00 AM EDT

Attend In-Person

New York, NY

Apr 28, 2023

9:00 AM EDT

RESERVE MY SEAT

Privileged Members attend this program at no cost.

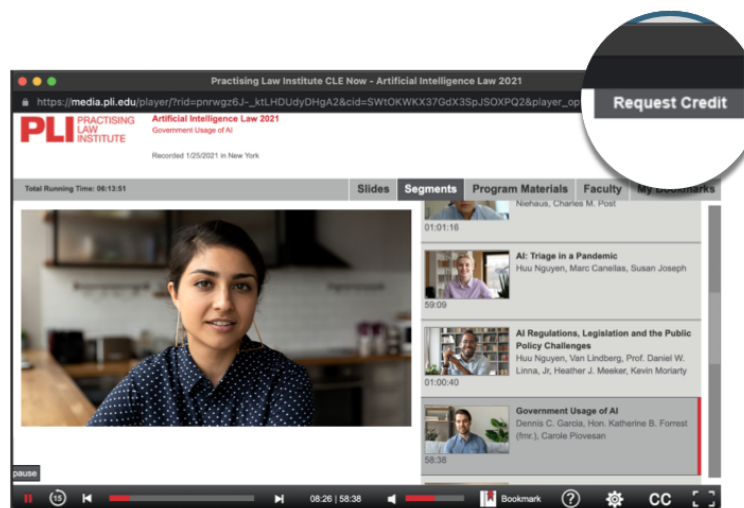


Course materials will be available to attendees prior to the start of the program

Program ID: 359491

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If you need assistance, contact PLI Customer Service
800.260.4PLI M-F 8AM-6PM EST or info@pli.edu



Credit Details

Edit Jurisdiction →

CLE for New York

Credit Status: **Approved**



7.5 Total Credits

7.5 Skills

This program is transitional. Both newly admitted and experienced attorneys can earn credit for PLI's transitional live programs.

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Schedule & Location

Apr 28, 2023

9:00 AM EDT

Opening Remarks



9:15 AM EDT

Preparing to File a Lawsuit



10:15 AM EDT

Responding to a Complaint



11:15 AM EDT

Networking Break

11:30 AM EDT

Pretrial Practice: Preliminary Remedies, Summary Judgment Motions and Discovery



12:45 PM EDT

Lunch

1:45 PM EDT**Depositions Dos and Don'ts****2:45 PM EDT****Use of Experts****3:45 PM EDT**

Networking Break

4:00 PM EDT**Pretrial Settlement Considerations****5:00 PM EDT**

Adjourn

[Download Full Schedule](#) **Location****PLI New York**

1177 Avenue of the Americas

Entrance on 45th Street

New York, NY



Google

Map data ©2023 Google [Report a map error](#)**Hotel Information** **Program Faculty****Chairperson****David G. Keyko****Pillsbury Winthrop Shaw Pittman LLP****Speakers**



Lauren E. Aguiar
Skadden, Arps, Slate, Meagher & Flom LLP



Amy Conners
White & Case LLP



Hon. Holly B. Fitzsimmons
United States District Court, District of Connecticut



George G. Gordon
Dechert LLP



Hon. Barbara Moses
United States District Court, Southern District of New York



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JAMS



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United States District Court, District of New Jersey



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JAMS Mediator and Arbitrator



Mark E. Segall
JAMS

Program Attorney



Dana M. Berman
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